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Attorneys for Defendant  
MICHAEL PAUL LOPEZ

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MICHAEL PAUL LOPEZ,  
  
Defendant.

CASE NOS. 1:21-CR-00151-DAD-BAM  
1:16-CR-00017-DAD-BAM

STIPULATION TO CONTINUE SENTENCING  
DATE; ORDER

DATE: October 4, 2021  
TIME: 9:00 a.m.  
COURT: Hon. Dale A. Drozd

**STIPULATION**

Counsel for Defendant Michael Paul Lopez, by and through his counsel of record, Assistant Federal Defender Meghan D. McLoughlin, and Plaintiff United States of America, by and through its counsel of record, Assistant United States Attorney Laurel Montoya, hereby stipulate as follows:

1. By previous order, both matters 1:21-cr-00151-DAD-BAM and 1:16-cr-00017-DAD-BAM are set for sentencing on October 4, 2021.
2. By this stipulation, defendant now moves to continue the sentencing hearings in both cases until December 13, 2021. As this is a sentencing and a change of plea and admission have already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Counsel for defendant has also been diligently seeking medical records related to

defendant and vital at sentencing, and is still waiting to receive those documents.

b) In addition, counsel for defendant is investigating pending state court matters identified in the Presentence Investigation Report.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: August 31, 2021

HEATHER E. WILLIAMS  
Federal Defender

/s/ Meghan D. McLoughlin  
MEGHAN D. McLOUGHLIN  
Assistant Federal Defender

Dated: August 31, 2021

/s/ Laurel Montoya  
LAUREL MONTOYA  
Assistant United States Attorney

### FINDINGS AND ORDER

IT IS SO ORDERED.

Dated: September 1, 2021

Dale A. Inghel  
UNITED STATES DISTRICT JUDGE